

1 JOSHUA L. DRATEL
2 *Pro Hac Vice*
3 Law Offices of Joshua L. Dratel, P.C.
4 29 Broadway, Suite 1412
5 New York, New York 10006
6 T. 212-732-0707
7 F. 212-571-3792
8 jdratel@joshuadrate.com

9 ERIK B. LEVIN
10 CABN 208274
11 Law Office of Erik Levin
12 2001 Stuart Street
13 Berkeley, California 94703
14 T. 510-978-4778
15 F. 510-978-4422
16 erik@erikblevin.com

17 *Attorneys for Defendant Adam Shafi*

18 IN THE UNITED STATES DISTRICT COURT
19 FOR THE NORTHERN DISTRICT OF CALIFORNIA

20 UNITED STATES OF AMERICA,) NO. 15 Cr. 582 WHO
21 Plaintiff,) STIPULATED MOTION AND ORDER
22 v.) TO CONTINUE ORAL ARGUMENT
23 ADAM SHAFI,)
24 Defendant)

25 The parties stipulate that oral argument on the motion for reconsideration of
26 detention [Dkt. #49] be continued from February 18, 2016 at 1:30 p.m. to February 25,
27 2016 at 1:30 p.m. The parties agree that this stipulated motion to continue oral argument
28 may be granted based on this stipulated motion and the declaration of counsel below, and
29 without oral argument.

30 STIPULATED MOTION
31 TO CONTINUE ORAL ARGUMENT
32 CR 15-0582 WHO

Declaration of Counsel

1. Along with Joshua L. Dratel, I represent Mr. Adam Shafi in the above-captioned matter and I submit this declaration based on information and belief.

2. Mr. Shafi's motion for reconsideration of detention order is scheduled for oral argument on the Court's February 18, 2016, calendar.

3. An unforeseen health emergency prevents counsel from attending oral argument.

4. The parties have agreed to continue oral argument until the Court's February 25, 2016, calendar.

5. While Alameda County Counsel is available on those dates as well, Lieutenant Dan Brodie (who also planned to attend) is not available on February 25, 2016.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 17th day of February, 2016, at Berkeley, California.

s/ Erik B. Levin

SO STIPULATED.

BRIAN STRETCH

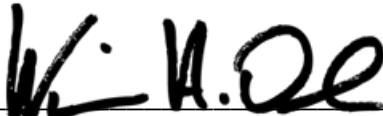
Acting United States Attorney

s/ Jeffrey Shih
Jeffrey Shih, Esq.
Assistant United States Attorney

1

2 PURSUANT TO STIPULATION, IT IS SO ORDERED. If it is necessary, I will
3 allow the Alameda County Sheriff's Office to supplement its filings after the hearing if
an issue is raised that requires Lt. Brodie's input.

4 DATED: February 18, 2016

5 
6 JUDGE WILLIAM H. ORRICK

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22 STIPULATED MOTION
TO CONTINUE ORAL ARGUMENT

3

CR 15-0582 WHO